

UNITED STATES DISTRICT COURT FOR  
THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

ALEXIS SANCHEZ, ET. AL,	)	
	)	CAUSE NO.: 1:25-CV-170
	)	
Plaintiffs,	)	
	)	
v.	)	JUDGE SUSAN J. DLOTT
	)	
UNION INSTITUTE AND UNIVERSITY,	)	
ET. AL,	)	
	)	
Defendants.	)	

**PLAINTIFFS' NOTICE OF FILING A MOTION FOR RELIEF FROM STAY TO  
PURSUE INSURANCE PROCEEDS AND ABANDONMENT OF INSURANCE  
PROCEEDS**

Plaintiffs, through undersigned counsel, provide notice to this Court that April 16, 2025 they filed an appearance as creditors and a Motion for Relief from Stay to Pursue Insurance Proceeds and Abandonment of Insurance Proceeds in the United States Bankruptcy Court for the Southern District of Ohio styled In re: The Matter of Union Institute & University, et al., Case No. 1:25-bk-10562. The matter is pending before the honorable Judge Beth A. Buchanan. The Section 341 Bankruptcy Meeting is scheduled for today, April 17, 2025 at 2:30 PM. Attached for the Court's review are: United States Bankruptcy Court ECF No. 27, Notice of Appearance and Request for Notice, attached as **Exhibit A**; United States Bankruptcy Court ECF No. 28, Motion for Relief from Stay to Pursue Insurance Proceeds and Abandonment of Insurance Proceeds attached as Exhibit B; and United States Bankruptcy Court ECF 29, Certificate of Service, attached as **Exhibit C**.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 17, 2025, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's CM/ECF system.

/s/Robert E. DeRose  
Robert E. DeRose (OH Bar No. 0055214)